

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF SETH
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am also Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Memorandum of Law in Opposition to Plaintiffs' *Daubert* Motion to Preclude Opinions of Defense Expert Jon P. Fryzek, MPH, Ph.D.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of Jon P. Fryzek, MPH, Ph.D., dated August 1, 2021, with Appendices A-C, served in MDL 2875.

3. Attached hereto as Exhibit B is a true and accurate copy of the transcript of the deposition of Jon P. Fryzek, MPH, Ph.D., in MDL 2875, dated September 30, 2021, with Errata.

4. Attached hereto as Exhibit C is a true and correct copy of the article, Zeng, et al., *Oral intake of ranitidine increases urinary excretion of N-nitrosodimethylamine*, 37(6) CARCINOGENESIS 625-34 (2016), with published retraction.

5. Attached hereto as Exhibit D is a true and correct copy of the article Song, et al., *Dietary Nitrates, Nitrites, and Nitrosamines Intake and the Risk of Gastric Cancer: A Meta-Analysis*, 7 NUTRIENTS 9872-9895 (2015).

6. Attached hereto as Exhibit E is a true and correct copy of the article Goodman, et al., *High-Fat Foods and the Risk of Lung Cancer*, 3 EPIDEMIOLOGY 4, 288-99 (1992).

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg, *Liaison Counsel*
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Dated: December 1, 2021